

Judge Benjamin H. Settle

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JONELLE LAJOHN BRAUN,

Defendant.

NO. CR11-5241BHS

INFORMATION  
(Felony)

The United States Attorney charges that:

**COUNT ONE**  
**(Felon in Possession of Firearm)**

On or about January 28, 2011, within the Western District of Washington, the defendant, JONELLE LAJOHN BRAUN, having been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit:

- Third Degree Assault. Pierce County Superior Court (Juvenile Court) Cause No. 00-8-00788-1.
- Second Degree Possession of Stolen Property. Pierce County Superior Court (Juvenile Court) Cause No. 03-8-01625-7.
- Residential Burglary. Pierce County Superior Court (Juvenile Court) Cause No. 04-8-02691-9.
- Attempted Unlawful Delivery of a Controlled Substance (Cocaine). Pierce County Superior Court Cause No. 07-1-00107-9.

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- Second Degree Unlawful Possession of a Firearm (two counts). Pierce County Superior Court Cause No. 08-1-02145-1.
- Unlawful Delivery of a Controlled Substance (Cocaine). Pierce County Superior Court Cause No. 09-1-03222-1.

did knowingly possess a firearm, to wit, a Winchester 30.06 model 70 rifle, serial number G290167, which had been shipped and transported in interstate commerce.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT TWO**  
**(Felon in Possession of Firearm)**

On or about March 23, 2011, within the Western District of Washington, the defendant, JONELLE LAJOHN BRAUN, having been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit:

- Third Degree Assault. Pierce County Superior Court (Juvenile Court) Cause No. 00-8-00788-1.
- Second Degree Possession of Stolen Property. Pierce County Superior Court (Juvenile Court) Cause No. 03-8-01625-7.
- Residential Burglary. Pierce County Superior Court (Juvenile Court) Cause No. 04-8-02691-9.
- Attempted Unlawful Delivery of a Controlled Substance (Cocaine). Pierce County Superior Court Cause No. 07-1-00107-9.
- Second Degree Unlawful Possession of a Firearm (two counts). Pierce County Superior Court Cause No. 08-1-02145-1.
- Unlawful Delivery of a Controlled Substance (Cocaine). Pierce County Superior Court Cause No. 09-1-03222-1.

did knowingly possess a firearm, to wit, a Llama .380 caliber semi-automatic pistol, serial number 595250, which had been shipped and transported in interstate commerce.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT THREE**  
**(Human Trafficking)**

In or during December 2010, and continuing through on or about February 23, 2011, within the Western District of Washington, JONELLE BRAUN did knowingly recruit, harbor, transport, provide, and obtain other persons, Juvenile Female-1 (JF-1), for labor, with knowledge and in reckless disregard that the providing and obtaining of JF-1

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1 for labor was by means of a scheme and plan to cause JF-1 to believe that if JF-1 did not  
2 perform the labor, JF-1 would suffer serious harm, and JONELLE BRAUN did benefit  
3 financially from participating in a venture which had engaged in the providing and  
4 obtaining of JF-1 for labor by such means.

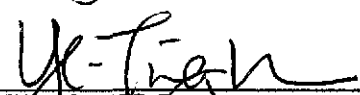
5 All in violation of Title 18, United States Code, Section 1590.

6 DATED: December 20<sup>th</sup>, 2011.

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8   
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